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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
GENERAL MOTORS CORP., et. al.	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
	:	

**OBJECTION TO PROPOSED CURE AMOUNT FOR THE REYNOLDS AND
REYNOLDS COMPANY PURSUANT TO NOTICE OF (I) DEBTORS' INTENT TO
ASSUME AND ASSIGN EXECUTORY CONTRACTS, UNEXPIRED LEASES OF
PERSONAL PROPERTY, AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL
PROPERTY AND (II) CURE AMOUNTS RELATED THERETO**

The Reynolds and Reynolds Company ("Reynolds"), by and through counsel, hereby object to the Cure Amount proposed by Debtor, General Motors Corporation ("Debtor"), pursuant to the Notice of (I) Debtors' Intent to Assume and Assign Executory Contracts, Unexpired Leases of Personal Property, an Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the "Notice"). In support of its objection, Reynolds states as follows:

1. Pursuant to the terms of the Notice, Reynolds received two notices of user identification and password information to retrieve information on the Contract Website, as defined in the Notice, regarding proposed cure amounts for executory contracts between Reynolds and Debtor.

2. As instructed, Reynolds retrieved the proposed cure amount information from the Contract Website. According to the Contract Website, Debtor indicates two contracts between Reynolds and Debtor, both with a proposed cure amount of \$0.00.

3. Reynolds has multiple contracts with Debtor and, from the information contained on the Contract Website, it is impossible to tell to which executory contracts the proposed cure amounts of \$0.00 relate.

4. Reynolds and Debtor entered into the GM On-Demand Inventory Data Extraction Service Statement of Work (GM-071204) dated February 14, 2008 (the "Data Contract"). A copy of the Data Contract is available upon request to undersigned counsel.

5. As of June 1, 2009, the petition date herein, Debtor owes Reynolds the amount of \$31,920.00 for unpaid invoices as follows:

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Unpaid Balance</u>
0540330833	3/18/09	\$9,576.00
0504349717	4/30/09	\$7,980.00
0504364799	5/29/09	\$7,581.00
0540364800	5/29/09	\$6,783.00

Copies of the invoices and related purchase orders are also available upon request to undersigned counsel.

6. Accordingly, to the extent the Data Contract is one of the contracts included on the Contract Website and subject to the Notice, Reynolds asserts a cure amount of \$31,920.00 and objects to a proposed cure amount of \$0.00.

7. Reynolds has no other objection to the assumption and/or assignment of any contract between Reynolds and Debtor, including any proposed cure amounts.

WHEREFORE, Reynolds requests a determination that the cure amount for the Data Contract as of June 1, 2009 is \$31,920.00.

Dated: New York, New York
June 15, 2009

Respectfully Submitted,

/s/ Martin Eisenberg
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Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Objection of The Reynolds and Reynolds Company was served this 15th day of June 2009, electronically via the Court's CM/ECF System on the parties registered thereto, and upon the following parties by properly addressed overnight mail, and by e-mail as indicated below:

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